

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

**IN RE: ETHICON, INC., PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY  
LITIGATION**

**THIS DOCUMENT APPLIES TO:**

**ETHICON WAVE 8 CASES LISTED IN  
EXHIBIT A TO DKT. 6825**

**Master File No. 2:12-MD-02327  
MDL 2327**

**WAVE 8**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

**DEFENDANTS' REPLY IN SUPPORT OF NOTICE OF ADOPTION OF PRIOR  
DAUBERT MOTION TO EXCLUDE DONALD R. OSTERGARD, M.D.  
FOR ETHICON WAVE 8**

Defendants hereby adopt and incorporate by reference the Wave 3 Reply in Support of Motion to Exclude General Causation Testimony of Donald R. Ostergard, M.D., Dkt. 3011. Defendants respectfully request that the Court exclude Dr. Ostergard's testimony for the reasons expressed in the Wave 3 briefing. This notice applies to the Wave 8 cases identified in Exhibit A attached to Defendants' Wave 8 Notice of Adoption, Dkt. 6825.

Respectfully submitted,

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:wiliam.gage@butlersnow.com)

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824

Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage